

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN,)
DEONTAE TATE, JEREMY S. MELTON,)
ISSACCA POWELL, KEITH BURGESS,)
TRAVIS BOYD, TERRENCE DRAIN, and)
KIMBERLY ALLEN on behalf of themselves and)
all similarly situated persons,)

Plaintiffs,)

v.)

BILL OLDHAM; FLOYD BONNER, JR.;)
ROBERT MOORE; KIRK FIELDS; CHARLENE)
MCGHEE; REGINALD HUBABARD; DEBRA)
HAMMONS; TIFFANY WARD; SHELBY)
COUNTY, TENNESSEE; TYLER)
TECHNOLOGIES, INC.; GLOBAL TEL*LINK)
CORPORATION; SOFTWARE AG USA, INC.;)
SIERRA-CEDAR, INC.; SIERRA SYSTEMS)
GROUP, INC.; and TETRUS CORP.,)

Defendants.)

C.A. No. 2:16-cv-2907-SHM/tmp

**DEFENDANT GLOBAL TEL*LINK CORPORATION'S RESPONSE IN OPPOSITION
TO PLAINTIFFS' MOTION FOR SUBSTITUTION OF PARTY**

Defendant Global Tel*Link Corporation ("GTL") files its Response in Opposition to Plaintiffs' Motion for Substitution of Party.

Pursuant to Rule 10(c) of the Federal Rules of Civil Procedure, GTL adopts and incorporates by reference the arguments raised in the Shelby County Defendants' Response in Opposition to Plaintiffs' Motion for Substitution of Party [Doc. 253] except for those portions relating to injunctive relief because such relief is not sought against GTL.

For the reasons set forth in the Shelby County Defendants' Response, GTL requests that the Court deny Plaintiffs' Motion for Substitution of Party.

Respectfully submitted,

s/ R. Brandon Bundren

R. Brandon Bundren, BPR #30985

James L. Murphy III, BPR #9589

BRADLEY ARANT BOULT CUMMINGS LLP

1600 Division Street, Suite 700

Nashville, TN 37203

Tel: 615.244.2582

Fax: 615.252.6380

bbundren@bradley.com

jmurphy@bradley.com

*Attorneys for Global Tel*Link Corporation*

CERTIFICATE OF SERVICE

I certify that on September 20, 2019, I electronically filed a true and correct copy of **Defendant Global Tel*Link Corporation's Response in Opposition to Plaintiffs' Motion for Substitution of Party** with the U.S. District Court for the Western District of Tennessee using the Court's Electronic Case Filing System, which will send notice of this filing to counsel of record as follows:

Attorneys for Plaintiffs:

Brice Moffatt Timmons (btimmons@blackmclaw.com)
John C. Ryland (jryland@blackmclaw.com)
Michael G. McLaren (mmclaren@blackmclaw.com)
Warren Patrick Campbell (wcampbell@blackmclaw.com)
William E. Cochran, Jr. (wcochran@blackmclaw.com)
BLACK McLAREN JONES RYLAND & GRIFFEE, P.C.

Claiborne Hembrick Ferguson (claiborne101@yahoo.com)
THE CLAIBORNE FERGUSON LAW FIRM, P.A.

Frank L. Watson, III (fwatson@watsonburns.com)
William F. Burns (bburns@watsonburns.com)
William E. Routt, III (wroutt@watsonburns.com)
WATSON BURNS, LLC

Joseph S. Ozment (jozment@oz-law.net)
LAW OFFICE OF JOSEPH S. OZMENT, PLLC

Daniel Owen Lofton (dlofton@craigandloftonlaw.com)
LAW OFFICE OF CRAIG & LOFTON, PC

Matthew Charles Gulotta (matt@gulottalaw.net)
THE GULOTTA FIRM

Steven George Wilson (stevewilsonlaw@gmail.com)
THE STEVE WILSON FIRM

Attorneys for Defendants Bill Oldham, Floyd Bonner, Jr., Kirk Fields, Reginald Hubbard, Tiffany Ward, Robert Moore, Charlene McGhee, Debra Hammons, Shelby County, Tennessee:

Robert E. Craddock, Jr. (rcraddock@wyattfirm.com)
Byron Norman Brown (bbrown@wyattfirm.com)
Meghan McMahon Cox (mcox@wyattfirm.com)
Odell Horton, Jr. (ohorton@wyattfirm.com)
WYATT TARRANT & COMBS, LLP

Emmett Lee Whitwell (lee.whitwell@shelbycountyttn.gov)
SHELBY COUNTY ATTORNEY'S OFFICE

Attorneys for Defendant Tyler Technologies, Inc.:

Beth Bivans Petronio (beth.petronio@klgates.com)
K&L GATES LLP

Bradley E. Trammell (btrammell@bakerdonelson.com)
BAKER DONELSON BEARMAN CALDWELL & BERKOWWITZ

Attorneys for Defendant Sierra-Cedar, Inc.:

Kevin David Bernstein (kdb@spicerfirm.com)
Albert G. McLean (amclean@spicerfirm.com)
SPICER RUDSTROM PLLC

Attorneys for Software AG USA, Inc.:

Douglas F. Halijan (dhalijan@bpjlaw.com)
William David Irvine (wirvine@bpjlaw.com)
BURCH PORTER & JOHNSON PLLC

Attorneys for Sierra Systems Group, Inc.:

Heather Marie Gwinn Pabon (hgwinn@grsm.com)
GORDON REES SCULLY & MANSUKHANI, LLP

Attorneys for Tetras Corp.:

Thomas Anthony Swafford (tony.swafford@arlaw.com)
ADAMS & REESE, LLP

s/ R. Brandon Bundren

R. Brandon Bundren